

1 RACHEL M. CROCKETT
California State Bar No. 266447
2 **LLOYD & MOUSILLI, PLLC**
11807 Westheimer Road
3 Suite 550 PMB 944
4 Houston, TX 77077
Tel: (512) 609-0059
5 Fax: (281) 783-8565
litigation@lloydmousilli.com

6 **ATTORNEYS FOR DEFENDANTS**

7
8 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA
9 **WESTERN DISTRICT**

10 **DAVID HOUGH;**
MOULOUD HOCINE;
11 **JENNIFER LEHMKUHL HILL;**
AMUND THOMPSON;
12 **PAUL PANICO**

13 *Plaintiffs,*

14 **v.**

15
16 **RYAN CARROLL; MAX K. DAY;**
MAX O. DAY; MICHAEL DAY;
17 **YAX ECOMMERCE LLC; PRECISION**
18 **TRADING GROUP, LLC;**
WA DISTRIBUTION LLC;
19 **PROVIDENCE OAK PROPERTIES, LLC;**
WA AMAZON SELLER LLC;
20 **MKD INVESTMENT ADVISOR, LLC;**
MKD FAMILY BENEFICIARY, LLC;
21 **MKD FAMILY PRIVATE MANAGEMENT**
22 **COMPANY, LLC;**
MAX DAY CONSULTING, LLC;
23 **HOUTEX FARM EQUITY PARTNERS**
24 **LLC; BUSINESS FINANCIAL SOLUTIONS**
ADVISORY LLC; EVO MAXX LLC;
25 **YAX IP AND MANAGEMENT INC. (D.B.A.**
“FULFILLABLE”); WWKB LLC;
26 **DREAMS TO REALITY LLC;**

27 *Defendants.*

Case No.: 2:24-cv-02886

Assigned for all purposes to:
JUDGE WESLEY L. HSU

DEFENDANTS RYAN CARROLL; MAX
K. DAY; MAX O. DAY; MICHAEL DAY;
YAX ECOMMERCE LLC; PRECISION
TRADING GROUP, LLC; WA
DISTRIBUTION LLC’S UNOPPOSED
REQUEST FOR REMOTE
APPEARANCE

Action Filed: April 9, 2024
Trial Date: N/A

1 COME NOW **JURISDICTIONAL DEFENDANTS RYAN CARROLL; MAX K.**
2 **DAY; MAX O. DAY; MICHAEL DAY; YAX ECOMMERCE LLC; PRECISION**
3 **TRADING GROUP, LLC; and WA DISTRIBUTION LLC (“Defendants”)**, and hereby files
4 *Defendants’ Unopposed Request for Remote Appearance (“Request”)* and respectfully shows the
5 Court as follows:
6

7 **I. INTRODUCTION**

- 8 1. On April 9, 2024, Plaintiffs filed their Complaint and Ex Parte Application for a
9 Temporary Restraining Order (“**TRO**”).
- 10 2. On April 11, 2024, Defendants filed their Opposition to Plaintiffs’ TRO.
- 11 3. On April 12, 2024, the Court issued its Standing Order, mandating service upon the
12 Defendants by the Plaintiffs. However, such service was not effectuated.
- 13 4. On April 15, 2024, the Court granted Plaintiffs’ TRO. It was further ordered that
14 Jurisdictional Defendants appear before the Court on April 19, 2024, at 11:00 AM PT.
- 15 5. Good cause exists for the granting of this Request as the Jurisdictional Defendants’ primary
16 counsel does not reside locally and is unable to appear at the hearing in-person due to scheduling
17 conflicts with other matters.
- 18 6. Defendants respectfully requests that the Court allow Defendants to appear remotely at the
19 Preliminary Injunction hearing scheduled for April 29, 2024, at 3:00 PM PT.
- 20 7. The request is not made for the purpose of delay, but rather, to proceed with the hearing as
21 ordered and afford the Jurisdictional Defendants their counsel of choice for this hearing.
- 22 8. Counsel for Plaintiff has indicated they do not oppose the relief requested herein.
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1 **II. CONCLUSION**

2 9. Based on the foregoing and for good cause shown, Defendants respectfully requests that
3 this Court grant Defendants' Unopposed Request for Remote Appearance and for such other and
4 further relief to which Defendants may show itself to be justly entitled.
5

6 Dated: April 24, 2024.

Respectfully submitted,

7 By: /s/ Rachel M. Crockett

8 Rachel M. Crockett
9

10 **CERTIFICATE OF COMPLIANCE**

11 The undersigned, counsel of record for Defendants, certifies that this Request for Remote
12 Appearance contains 294 words, which complies with the word limit of L.R. 11-6.1

13 /s/ Rachel M. Crockett

14 Rachel Crockett
15

16 **CERTIFICATE OF SERVICE**

17 I hereby certify that a true and correct copy of the foregoing document, and any
18 attachments, will be served to counsel of record, in accordance with the governing rules of
19 procedure regarding service in this court on this ***April 24, 2024***, via email as follows:

20 /s/ Rachel Crockett

21 Rachel Crockett
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